IN THE MATTER OF

BROMSGROVE DISTRICT AND REDDITCH BOROUGH LOCAL PLANS

OPINION

Introduction

1. In this matter I am instructed by Bromsgrove District Council and Redditch Borough Council (hereinafter "the Councils") in respect of the Local Plan for each authority.

Request for Counsel's Opinion

2. At the hearing sessions for examination in public conducted 23 and 24 March, the Local Plans Inspector asked a specific question: ***"Are the Councils satisfied that the information before me is consistent with, and not in conflict with, the legal requirements on SEA"***

3. This question has been posed in the context of the planned housing growth for Redditch. The growth contained in the two plans involved the use of ADR land in Redditch and large urban extensions in Bromsgrove District. The former are allocations in the Borough of Redditch Local Plan No.4, at Webheath, A435 ADR and Brockhill. The latter are allocations in the Bromsgrove District Plan at Foxlydiate and again at Brockhill: these are known as the cross boundary sites. In the context of the Councils assessment work these are parts of Area 3 (Webheath), part of Area 18 (A435), part of Area 4 (Foxlydiate) and all of Area 6 (Brockhill within Redditch and Bromsgrove)

4. The primary issue relates to the consideration of reasonable alternatives.

5. This opinion provides my answers to that question. It is to be submitted to the Local Plans Inspector.

OPINION

The SEA Directive and the UK Regulations

6. Yes, the information before the Inspector is consistent with, and not in conflict with, the legal requirement on SEA. The reasons are outlined below.

7. The starting point for answering this question is to identify precisely what are those legal requirements.

8. Section 19(5) of the Planning and Compulsory Purchase Act 2004 (hereinafter "the 2004 Act") requires a local planning authority (hereinafter "LPA") to carry out an appraisal of the sustainability of the proposals in each development plan document and to prepare a report of the findings of the appraisal. This is known as a Sustainability Appraisal (hereinafter "SA").

9. Directive 2001/42/EC of the European Parliament and Council is a Directive on the assessment of the effects of certain plans and programme on the environment (hereinafter the SEA Directive"). It is a requirement of the SEA Directive that an environmental assessment be carried out in relation to plans and programmes which set a framework for future development consent of projects to which the

Environmental Impact Assessment Directive applies. SA incorporates the requirement of the SEA Directive.

10. Article 5(1) provides that

"Where an Environmental Assessment is required under article 3(1), an Environmental Report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex 1. Annex 1 sets out a number of matters, including at sub paragraph (h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken…."

11. Annex 1 of the SEA Directive requires that information to be provided under Article 5 including an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

12. The SEA Directive has been implemented into domestic law by the Environmental Assessment of Plans and Programmes Regulations 2004 (hereinafter "the SEA Regulations"). Part 3 of those Regulations concerns environmental reports and consultation procedures. Regulation 12 provides that:

"(1) Where an environmental assessment is required by any provision of Part 2 of these regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of –

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.

(3) The report shall include such information referred to in schedule 2 to these regulations as may be reasonably required, taking account of – [a number of matters are then set out in sub-paragraphs (a) to (d)]…."

13. Paragraph 8 of Schedule 2 requires ***"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken …"*** The other paragraphs in Schedule 2 deal with a number of other items of information which must be included in an Environmental Report (ER), for example the likely significant effects on the environment, including such matters as biodiversity, fauna, flora and climatic factors: see paragraph 6 of Schedule 2.

14. Regulation 13(1) provides that:

"(1) Every draft plan or programme for which an Environmental Report has been prepared in accordance with Regulation 12 and its accompanying Environmental

Report ('the relevant documents') shall be made available for the purposes of consultation in accordance with the following provisions of this Regulation."

15. It is important to note that the Directive and the Regulations are not prescriptive about the approach to be taken to the assessment of reasonable alternatives.

Guidance on the SEA/ SA Process and Reasonable Alternatives

16. Guidance on implementation of the Directive has been issued by the European Commission.[1] Para. 1.5 of that Guidance makes it clear that it represents only the views of the Commission and is not of a binding nature. It is important to observe the status of the EC Guidance. The Guidance is not a source of law: see Ouseley J in ***Heard v Broadland DC*** [2012] EWHC 344 (Admin) (paragraph 69)

17. Para. 4.2 of the Guidance states:

"As a matter of good practice, the Environmental Assessment of plans and programmes should influence the way the plans and programmes themselves are drawn up. While a plan or programme is relatively fluid, it may be easier to discard elements which are likely to have undesirable environmental effects than it would be when the plan or programme has been completed. At that stage, an Environmental Assessment may be informative but is likely to be less influential. Article 4(1) places a clear obligation on authorities to carry out the assessment during the preparation of the plan or programme."

18. Para. 5.11 of the Guidance states that:

"The obligation to identify, describe and evaluate reasonable alternatives must be read in the context of the objective of the Directive which is to ensure that the effects of implementing plans and programmes are taken into account during their preparation and before their adoption."

19. Para. 5.12 of the Guidance states:

"In requiring the likely significant environmental effects or reasonable alternatives to be identified, described and evaluated, the Directive makes no distinction between the assessment requirements for the drafted plan or programme and for the alternatives. The essential thing is that the likely significant effects of the plan or programme and the alternatives are identified, described and evaluated in a comparable way. The requirements in article 5(2) concerning the scope and level of detail for the information in the report apply to the assessment of alternatives as well. It is essential that the authority or Parliament responsible for the adoption of the plan or programme as well as the authorities and the public consulted, are presented with an accurate picture of what reasonable alternatives there are and why they are not considered to be the best option. The information referred to in Annex 1 should thus be provided for the alternatives chosen. …"

20. This EC Guidance is clearly very broad brush. It encourages an evaluation of the plan and alternatives in a comparable way. But that is not the same as requiring it to

[1] This guidance is known as the Implementation of Directive 2001/42 on the Effect of Certain Plans and Programmes on the Environment

be done in the same level of detail. And like the legislation it is non-prescriptive about the choice of alternatives or how the evaluation exercise is to be performed.

21. Guidance on SEA is also provided in the Planning Practice Guidance (hereinafter "PPG"), issued in March 2014. To the question "***When should a local planning authority start the sustainability appraisal process?"*** the guidance begins by highlighting the fact it is a process which should begin at an early stage.

"Sustainability appraisal is integral to the preparation and development of a Local Plan, to identify how sustainable development is being addressed, so work should start at the same time that work starts on developing the plan." (Paragraph: 006 Reference ID: 11-006-20140306)

22. The level of detail required is also addressed in the PPG. To the following question, "***What level of detail is required in a sustainability appraisal?"*** the guidance provides this:

"The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan." (Paragraph: 009 Reference ID: 11-009-20140306)

23. On the issue of what approach to take the PPG offers this guidance:

"How should plan-makers develop and refine options and assess effects?

Plan-makers should assess the policies in a draft Local Plan, and the reasonable alternatives, to identify the likely significant effects of the available options (Stage B). Forecasting and evaluation of the significant effects should help to develop and refine the proposals in each Local Plan document.

Reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach (when developing alternatives, paragraph 152 of the National Planning Policy Framework should be referred to).

Stage B should also involve considering ways of mitigating any adverse effects, maximising beneficial effects and ways of monitoring likely significant effects. (Paragraph: 017 Reference ID: 11-017-20140306)

24. Paragraph 152 of the National Planning Policy Framework reads:

"152. Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate."

25. The issue of alternatives is again addressed in the next paragraph of the PPG.

> **"How should the sustainability appraisal assess alternatives and identify likely significant effects?**
>
> ***The sustainability appraisal needs to compare all reasonable alternatives including the preferred approach and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted.***
>
> ***The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.***
>
> ***The sustainability appraisal should identify, describe and evaluate the likely significant effects on environmental, economic and social factors using the evidence base. Criteria for determining the likely significance of effects on the environment are set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.***
>
> ***The sustainability appraisal should identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them. The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).***
>
> ***Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.***
>
> ***The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented.***
>
> ***The development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of proposals (when preparing a Local Plan, paragraph 152 of the National Planning Policy Framework should be considered)."*** Paragraph: 018 Reference ID: 11-018-20140306 (My underlining)

26. Read together the various parts of the guidance in the PPG makes clear is that the process of SA should:

(a) begin at an early stage in the plan making process;

(b) the amount of detail needs to be proportionate and using proportionate resources;

(c) all reasonable alternatives should be assessed;

(d) reasonable alternatives should be identified at an early stage in the plan making process;

(e) the assessment of alternatives should "inform" the local planning authority's preferred option, but that is the extent its role (i.e. it should not dictate it)

(f) reasonable alternatives are the different, realistic options;

(g) the alternatives must be realistic and deliverable; and

(h) reasonable alternatives must be sufficiently distinct to allow meaningful comparisons to be made.

27. Again, the PPG, like the legislation and EC Guidance is non-prescriptive about how an LPA might select alternatives or evaluate those alternatives.

Case Law on SEA/SA and Reasonable Alternatives

28. There is case law on the SA and SEA process. Some of the key principles outlined and clarified from the case law, partly derived from the wording of the Directive, Regulations and guidance are as follows:

(i) The identification of reasonable alternatives is a matter of evaluative assessment for the local planning authority: Lord Justice Richards in **Ashdown Forest Economic Development LLP v Wealden DC and South Downs NPA** [2015] EWCA Civ 681 (paragraph 42).

(ii) This evaluative process is a planning judgment subject only to review by the courts on normal public law principles, including Wednesbury unreasonableness: **Ashdown Forest** (paragraph 42).

(iii) Subject to normal public law principles, it is open to a local plan authority to conclude there are no reasonable alternatives: **Ashdown Forest** (paragraph 42).

(iv) It is possible for an LPA not to have to drill down into the detail of alternatives for specific policies: **Ashdown Forest** (paragraph 42).

(v) The process of evaluating and rejecting alternatives is iterative: **Save Historic Newmarket Ltd and Others v Forest Heath DC and SSCLG** [2011] EWHC 606 (Admin) (paragraph 16).

(vi) It is open to an authority to reject alternatives at an early stage of the process: **Newmarket** (paragraph 16).

(vii) It is unnecessary to have to revisit these alternatives rejected at an early stage provided there are no changes of circumstances: **Newmarket** (paragraph 17).

(viii) The process of selection of alternatives can be done by reference to earlier documents: **Heard v Broadland** (paragraph 62).

(ix) Those consulted must be presented with an accurate picture of what reasonable alternatives there are and why they are not considered to be the best option: **Newmarket** (paragraph 17).

(x) The environmental assessment and the draft local plan must operate together so that consultees can consider each in light of the other: **Newmarket** (paragraph 17).

(xi) But this does not mean that when the final draft local plan and accompanying environmental assessment are put out for consultation before the necessary examination is held there cannot have been, during the iterative process, a prior ruling out of alternatives: **Newmarket** (paragraph 17).

(xii) But such reasons must remain valid if there has been any change in circumstances in the proposals in the draft local plan or other any material change in circumstances: **Newmarket** (paragraph 17).

(xiii) It is permissible to do so by reference in the final SA to the relevant part of the earlier assessment: **Newmarket** (paragraph 17).

(xiv) It is necessary to follow the documentation, bearing in mind the required information must be contained in the EA which accompanies the draft plan: **Newmarket** (paragraph 17)

(xv) An SA may not be an simple document and even hard to understand: **IM Properties Development Ltd v Lichfield DC and Taylor Wimpey UK Ltd and Persimmon Homes Ltd** [2015] EWHC 2077 (Admin) (paragraph 48)

(xvi) Additional explanatory notes to explain the intricacies of the SA are acceptable to help an inspector navigate around a SA, especially when subject to forensic examination: **IM Properties** (paragraph 48)

Discussion

29. The issue here relates to just two policies in the Borough of Redditch Local Plan No.4 (BORLP4) and one policy in the Bromsgrove District Plan (BDP): Policy 46 Brockhill East and Policy 48 Webheath Strategic Site in the Redditch Plan and Policy RCBD1 Redditch Cross Boundary Development in the BDP. All are concerned with meeting the needs of Redditch and are addressed in the BORLP4 Redditch LP SA May 2015.

30. The SA work began at an early stage in the plan making process (May 2008). High level options were considered at the Issues and Options Stage[2] with each

[2] Redditch Core Strategy Issues and Options (May 2008)

option assessed in the accompanying SA Report.[3] This process is summarised on page 17 of the final BORLP4 SA (May 2015). (OED/33a)

31. The SA work continued with the Redditch Preferred Draft Core Strategy in October 2008, including the business as usual / do nothing scenario (option 5). This process is summarised on pages 17 and 18 of the final BORLP4 SA, May 2015.

32. Following the abolition of the West Midlands Regional Spatial Strategy (WMRSS) and the introduction of the NPPF, Redditch took control of its housing requirement. It was clear that the needs could not be accommodated just within Redditch itself, whilst protecting the open spaces in the town, even using ADR land. ADR land being land which has already been removed from the Green Belt in an earlier plan specifically to meet the longer term needs of the town. It was clear some degree of cross boundary development was required to meet Redditch's housing needs.

33. Under the remit of the duty to cooperate, Redditch BC and Bromsgrove DC conducted joint consultation on the implications of meeting some of Redditch's need in neighbouring authority areas. This cross boundary work led to the Housing Growth Development Study (HGDS) (CDX 1.1) (January 2013) which is a key document in the consideration of reasonable alternatives.

34. The concern here cannot sensibly relate to the selection of the alternatives to accommodate the cross boundary growth. The Councils have conducted a completely exhaustive assessment of all of the land around Redditch in a 360 degree circumference, involving no less than 21 specific areas. A very wide range of alternatives were considered. This is all contained in the HGDS and its addendum.

35. Moreover, the Councils considered other alternatives than this to meet the cross boundary growth, such as a new settlement near the village of Feckenham (outside of the Green Belt). Within the HGDS consideration was also given to the use of Morton Stanley Park and the Redditch Golf Course (Area 3A) and part of the Arrow Valley Park and the Abbey Golf Course (Area 7) which are seen as key open spaces which should not be built upon. These options were ruled out as not reasonable alternatives at an early stage and the reasons, which only need to be outlined, are set out in the Housing Growth Development Study (pages 15 and 19,paragraph 5.6 – 5.15) and in the HGDS Addendum (pages 7 and 10 paragraphs A1.34 and A1.50).

36. Nor can the concern here be that it is in the HGDS where one finds the outline of reasons for rejection of these options which were not considered reasonable. Nor indeed the fact that the detail of the evaluation and rejection of reasonable alternatives is contained in the HGDS. It is perfectly permissible to set out the detail of that process in the HGDS rather than the final Redditch LP SA (May 2015). The case law is clear on this point. The process of evaluating and rejecting alternatives is iterative and it is perfectly open to an authority to reject alternatives at an early stage of the process. It is unnecessary to have to revisit these alternatives rejected at an

[3] Redditch SA of the Issues and Options (May 2008)

early stage provided there are no changes of circumstances and the process of selection of alternatives can be done by reference to earlier documents.

37. When the final draft local plan and the final SA were put out for consultation, it was perfectly permissible for there to have been a prior ruling out of alternatives in the HGDS. Of course, the reasons for ruling out alternatives had to remain valid at the time of the final SA in May 2015, but that is the case. The reason for rejecting Area 5 for example remains the unacceptable impact on heritage assets. What is required is that there is reference to the HGDS in the final Redditch LP SA. That is precisely the case. The HGDS is specifically referred to in the final Redditch LP SA at pages 18 and 20. It summarised the main conclusions which was the consideration of 18 sites initially, and the reasons for selection of Areas 4 and 6 to meet Redditch needs on cross boundary sites. It is quite unnecessary, and absurdly cumbersome, for the final SA to have to provide more detail than this, when the HGDS is specifically referred to and the conclusion summarised in the final SA.

38. Moreover, the HGDS was accompanied by its own detailed SA (CDB 3.1/ CDR 3.2). In other words the HGDS, as a specific part of both local plans, was subject to its own SA process. The fact this was a standalone document, with its own standalone SA is perfectly understandable. It involves two separate authorities with separate local plans engaged in a co-operative exercise of site selection and the rejection of alternatives. The HGDS was examining the ability to accommodate the needs of Redditch. But the cross boundary sites are allocations in the Bromsgrove Plan. Producing the HGDS and accompany SA as standalone documents was therefore entirely logical.

39. The extent of the reasonable alternatives considered in the HGDS is impressively wide, since it examined all the land around the full circumference of Redditch in 18 specific areas. In my experience it is rare to see such an exhaustive consideration of alternatives. As noted above the breadth of alternatives cannot be criticised. To make the process manageable and proportionate to the task in hand the Councils undertook a two stage process in their consideration of the alternatives. A Broad Area Assessment looking at all the 18 areas under consideration and a Focussed Area Assessment, examining the better areas in more detail. It goes far beyond what might be considered a necessary minimum to meet the requirements of the SEA and SA process. Most Council's examine and evaluate far fewer options than this in the SA process.

40. Understandably all of the detail on the evaluation of the alternatives is contained in the HGDS and its accompanying SA and is not repeated in the final BORLP4 SA report. Nonetheless the final SA for the BORLP4 (May 2015) does contain in tabular form an evaluation of all of these sites (Appendix D).

41. During the examination process, questions were raised about why Morton Stanley Park and Redditch Golf Couse (Area 3A), Arrow Valley Park (Area 7), the Webheath ADR (Area 3) and the A435 ADR (Area 18) were not included in the SA

process. The Council produced an Addendum to the HGDS and an accompanying SA in November 2014 to address these concerns. This too is identified and summarised in the final SA, on page 20.

42. In the Inspector's Post-hearing Note of 3 October 2014, a procedural concern was raised about the need to clearly present these alternatives in the SA for the Redditch LP. This has been done in the final Redditch LP SA. This is contained in Appendix D which sets out the SA assessment results for all the sites, including those allocated in the Redditch LP. The overall scoring is also provided on page 239 and 258 of the document. The SA is a useful tool to inform the process of site selection and consideration of the objectives of sustainable development. It does not need to be definitive as the basis for the selection of the sites simply because they have the highest score. Nonetheless, the cross boundary areas 6 (Brockhill) and 4 (Foxlydiate) achieve some of the highest scores (51 and 37) and the A435 ADR and Webheath ADR area and did similarly well with scores of 48 and 32

43. All scoring is of course a matter of planning judgment for the Councils.

44. The most suitable sites for the cross boundary allocations to emerge from the HGDS and HGDS SA were areas 4 and 6. Different combinations of areas were considered in the HGDS and SA. This was largely done to examine the highway implication of combining such large cross boundary sites because these two sites had already been identified and scored well against the other cross boundary alternatives and addressed the necessary capacity. The reasons why others sites such as 5 and 8 have been rejected are explained. Including them in lots of combinations is therefore completely unnecessary, albeit scenarios involving both sites were considered. The possibility of other combinations are far too numerous to consider and would be completely disproportionate, especially given the reasons why Area 4 and 6 are preferred. Moreover, it will be noted that the combination of areas 4 and 6 achieved the highest scenario score in the HGDS and were considered the most suitable in terms of sustainability to meet cross boundary growth.

45. The Addendum to the HGDS and accompanying SA (CDX1.47) did not change the conclusions about the suitability of Areas 4 and 6 as the best option for cross boundary growth of Redditch. But they did confirm the unsuitability of using areas 3A and 7, and the suitability of using the ADR land in Area 3 and 18 within Redditch. Again this is all reflected in the final Redditch LP SA. These are allocations made in the Redditch Plan within Redditch Borough. Clearly it can be argued that there was no reasonable alternative to the utilisation of ADR land, since it is land identified already for the long term needs of Redditch and already removed from the Green Belt for that purpose. No exceptional circumstances for its return to the Green Belt have been suggested. Leaving such sites fallow whilst developing Green Belt land would be irrational. It would be completely illogical to remove land from the Green Belt and not utilised such land. Green Belt land can only be removed on the basis of exceptional circumstances, and the full extent of the releases proposed would be completely undermined by the existence of vacant undeveloped land within Redditch

which is already removed from the Green Belt to meet longer term development needs.

46. The role of the Narrative (OED/46a) was not to replace the Final SA. The Inspector did not require a further SA to be conducted and that was made clear in his letter of 18 September 2015, which clarified the confusion which the Councils had about the Post Hearing Note of July 2015. The Councils were very grateful for that helpful clarification. The Narrative provides in a single document a summary and explanation of the whole local plan process especially as regards the selection of cross boundary sites process and the use of ADR land and the accompanying SA. Additional explanatory notes to explain the intricacies of the SA are acceptable to help an inspector navigate around a SA, especially when subject to forensic examination as in this case.

47. The Narrative also explains why further other alternatives scenarios involved the inclusion of Areas 8 and 18 and the exclusion of Areas 3R (Webheath ADR) and Area 4 (Foxlydiate) were not considered to be reasonable alternatives. This is because they do not provide sufficient capacity to meet the identified needs. At the final hearing sessions, some objectors suggested yet further variation of these ought to be considered, including increasing the extent of Area 8 to avoid the need for both Area 3R and 4. But it is not reasonable for the LPA to have to test yet further scenarios. The possibilities are endless. It must be remembered at all times that the task which the Councils are required to carry out must be proportionate. The policies under consideration here are a part of two plans with many policies all of which must be subject to the SA process.

48. The difficulties in collecting data and limitations of the data are set out on page 14 of the BORLP SA (May 2015) and the BDP SA page 56.

Conclusion

49. Overall, in my opinion, the Inspector, can be satisfied that the information before him is consistent with, and not in conflict with, the legal requirements on SEA. In my opinion, what the Councils have done exceeds the legal requirements for SEA and this is a far more comprehensive and robust assessment of alternatives than one might expect. It is arguably unnecessary to have had to look at the ADR sites in the context of the decision about selecting cross boundary sites to support policy RCBD1. The approach to the combination of sites must be viewed in context, with Areas 4 and 6 having already been identified as the most suitable for cross boundary growth and clear reasons given for the rejection of 5, 8 and 11. What is required must also be proportionate. Details and seemingly endless forensic analysis of scores and other scenarios is not appropriate. The final SA summarised previous work especially in the HGDS and SA, which is perfectly acceptable. A comparison of all the sites is provided in Appendix D of the Final Redditch LP SA which shows Areas 3R, 4, 6 and 18 scoring very well against the identified sustainability criteria.

50. I trust this addresses the issue upon which I have been asked to advise.

14 April 2016

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BROMGROVE DISTRICT PLAN

AND

BOROUGH OF REDDITCH LOCAL PLAN No 4

OPINION

Bromsgrove District Council and

Redditch Borough Council